

## Renee Pennington

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**From:** Renee Pennington  
**Sent:** Wednesday, June 7, 2017 5:00 PM  
**To:** 'Ben Hulse'  
**Cc:** david@pritzkerlaw.com; 'bgordon@levinlaw.com'; 'gzimmerman@meshbesh.com'; 'jmc@ciresiconlin.com'; Kim Alexander  
**Subject:** Bair Hugger -- PFS Issues

Good Morning, Mr. Hulse:

Yesterday our firm received a list of cases noted to have PFS deficiencies. We respond to the list as follows:

- 1) Butkus v. 3M Company, et al, Case # 0:16-cv-04353-JNE-FLN: Mr. Butkus has informed us that his wife is gravely ill, has been moved into an LTAC facility and he has been unavailable to provide his PFS. We herein request an additional extension in order to get with Mr. Butkus regarding his PFS response.
- 2) Adams v. 3M Company, et al, Case # 0:17-cv-00551-JNE-FLN: Ms. Adams PFS was filed today, June 7, 2017.
- 3) Kendall et al v. 3M Company, et al, Case # 0:16-cv-04373-JNE-FLN: Ms. Kendall's PFS was timely filed on April 4, 2017. We were informed by correspondence from your office, dated May 1, 2017, that the PFS was deficient in Section II(personal information) and Section VI, 3 (emotional distress). After reviewing those sections of Ms. Kendall's PFS, we were unable to discern what specific information was lacking. It appears that Ms. Kendall provided all information to the best of her ability. On May 5, 2017, I emailed you asking that you provide me with what, specifically, was required. To date I have received no response. We cannot cure the deficiency, if any, in this claim without more specificity. Please clarify what additional information is required.
- 4) Dipietro et al v. 3M Company, et al, Case # 0:16-cv-04359-JNE-FLN: At this time we are trying but have been unable to get in touch with Ms. Dipietro regarding the deficiencies in her PFS.
- 5) Spaich et al v. 3M Company, et al, Case #0:16-cv-04360-JNE-FLN: To date we have been unable to reach Mr. Spaich regarding his PFS.

Regards,

Renee



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